

**Remarks/Arguments****I. Status of the Application**

Claims 1-5 are pending in this application with the withdrawal of claims 6-11.

In the December 1, 2005 Office Action, the Examiner:

- A. Objected to claim 3 for various informalities;
- B. Rejected claim 1 under 35 U.S.C. §102(b) as allegedly anticipated by Japanese Patent Publication No. 60-144857 by Ishida Akira (“Akira”);
- C. Rejected claims 2-4 under 35 U.S.C. §103(a) as allegedly being unpatentable over Akira in view of U.S. Patent 6,693,678 to Tults et al. (“Tults”); and
- D. Objected to claim 5.

**II. The Objection to Claim 3 Should be Withdrawn**

In the December 1, 2005 Office Action, the Examiner objected to claim 3 for various informalities. Particularly, claim 3 was objected to for reciting “said IIC bus expander” when there was no antecedent basis.

Applicants have amended claim 3 to recite “an IIC bus expander” rather than “said IIC bus expander”. In view of this, Applicants respectfully request the withdrawal of the objection to claim 3.

**III. Claim 1 is Not Anticipated by Akira**

In the December 1, 2005 Office Action, the Examiner rejected independent claim 1 as allegedly anticipated under §102(b) by Akira. Applicants respectfully submit that independent claim 1 is not anticipated by Akira since Akira does not teach each and every limitation of claim 1.

Independent claim 1 is directed to an apparatus for isolating a noise intolerant device. The apparatus includes a digital bus that couples clock and data signals to a buffer. The buffer is operative in response to a control signal from a processor of the apparatus to selectively couple the clock and data signals to respective clock and data inputs of the noise intolerant device. In this manner the noise intolerant device is operatively coupled to the processor via the digital bus only when the processor is communicating with the noise intolerant device.

The Examiner alleges that Akira discloses all the claimed subject matter as recited in independent claim 1 and cites Figure 2 of Akira as well as page 3, lines 15-29 thereof. Applicants respectfully disagree that Akira discloses all the claimed subject matter as recited in independent claim 1.

Akira provides a CPU peripheral circuit that selectively couples a first data bus to a second data bus that is coupled to a peripheral device through a data bus buffer. First, nowhere does Akira disclose that clock signals are generated by the processor as recited in claim 1. Second, nowhere does Akira disclose that clock signals of any kind are coupled to a buffer via a digital bus as recited in claim 1. Third, nowhere does Akira disclose that the buffer selectively couples the clock signals to a clock input of a noise intolerant device upon receipt of control signal as recited in claim 1. Akira is totally silent as to clock signals and it cannot be inferred that such clock signals are generated by the processor, provided to the buffer, or provided from the buffer to the noise intolerant device.

It is well settled law that to anticipate, each and every limitation of the claim must be taught in a single reference. Since it has been shown above that Akira does not teach the limitations of independent claim 1, independent claim 1 cannot be

anticipated by Akira. Withdrawal of the §102(b) rejection to claim 1 and reconsideration thereof is thus respectfully requested.

IV. Claims 2-4 Are Not Obvious Over Akira and Tults

Claims 2-4 are dependent upon independent claim 1. Claims 2-4 thus include all of the limitations of independent claim 1.

A. Claim 2

In the December 1, 2005 Office Action, the Examiner rejected claim 2 as allegedly obvious over Akira in view of Tults. Applicants respectfully submit that claim 2 is not obvious over Akira and Tults.

It was shown above that Akira does not teach the limitations of independent claim 1. Therefore, the arguments with respect to the patentability of claim 1 as applied to Akira is applicable to the patentability of claim 2 as applied to Akira. As such, these arguments are thus incorporated herein as applicable to the patentability of claim 2.

The Examiner introduces Tults to show the use of inter integrated circuits (IICs) and an IIC bus expander for transferring a control signal to a buffer. The Examiner then submits that such use would have been obvious to substitute into Akira. Applicants respectfully submit that there is no teaching or suggestion in either Akira or Tults to provide the IIC bus and IIC bus expander into Akira.

An IIC bus system is a particular bus system that utilizes particular IIC components. As such, one cannot simply substitute an IIC bus or IIC bus expander into/for a regular bus.

Therefore, since Tults lacks any teaching as to the limitations of claim 2 absent from the teachings of Akira, the combination of Akira with Tults cannot make claim 2 obvious.

In view of the above, Applicants respectfully request the withdrawal of the §103(a) rejection of claim 2 and reconsideration thereof.

#### B. Claim 3

In the December 1, 2005 Office Action, the Examiner rejected claim 3 as allegedly obvious over Akira in view of Tults. Applicants respectfully submit that claim 3 is not obvious over Akira and Tults.

It was shown above that Akira does not teach the limitations of independent claim 1. Therefore, the arguments with respect to the patentability of claim 1 as applied to Akira is applicable to the patentability of claim 3 as applied to Akira. As such, these arguments are thus incorporated herein as applicable to the patentability of claim 3.

Moreover, there is no teaching or suggestion in Tults that make up the shortcomings of Akira. Therefore, the combination of Akira and Tults cannot render claim 3 obvious.

In view of the above, Applicants respectfully request the withdrawal of the §103(a) rejection of claim 3 and reconsideration thereof.

#### C. Claim 4

In the December 1, 2005 Office Action, the Examiner rejected claim 4 as allegedly obvious over Akira in view of Tults. Applicants respectfully submit that claim 4 is not obvious over Akira and Tults.

It was shown above that Akira does not teach the limitations of independent claim 1. Therefore, the arguments with respect to the patentability of claim 1 as applied to Akira is applicable to the patentability of claim 4 as applied to Akira. As such, these arguments are thus incorporated herein as applicable to the patentability of claim 4.

It was shown above that Akira does not teach the limitations of independent claim 1. Therefore, the arguments with respect to the patentability of claim 1 as applied to Akira is applicable to the patentability of claim 4 as applied to Akira. As such, these arguments are thus incorporated herein as applicable to the patentability of claim 4.

Moreover, there is no teaching or suggestion in Tults that make up the shortcomings of Akira. Therefore, the combination of Akira and Tults cannot render claim 4 obvious.

In view of the above, Applicants respectfully request the withdrawal of the §103(a) rejection of claim 4 and reconsideration thereof.

#### IV. Allowable Claim

In the December 1, 2005 Office Action, the Examiner indicated that claim 5 was objected to as dependent upon a rejected base claim but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

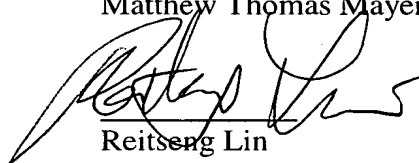
Applicants, however, respectfully decline to rewrite claim 5 in independent form since, as shown above, base claim 1 and intervening claims 3 and 4 are allowable and thus claim 5 is allowable.

V. Conclusion

It is respectfully submitted that all claims are in condition for allowance. Accordingly, Applicants respectfully request withdrawal of all objections and rejections, reconsideration of all claims, and that a timely Notice of Allowance of all claims be issued in this case.

No fee is believed to have been incurred by virtue of this Response. However if a fee is incurred on the basis of this Response, please charge such fee against deposit account 07-0832.

Respectfully submitted,  
David Glen White  
Matthew Thomas Mayer



Reitseng Lin  
Attorney for Applicants  
Registration No. 42,804  
609/734-6813

THOMSON multimedia Licensing Inc.  
Patent Operation  
PO Box 5312  
Princeton, NJ 08543-5312

February 28, 2006

## CERTIFICATE OF MAILING

I hereby certify that this amendment is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to [Mail Stop Amendment], Commissioner for Patents, Alexandria, Virginia 22313-1450 on:

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